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DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
SANCTIONS**

Date: February 19, 2020

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: May 11, 2020

Complaint filed: October 16, 2017

**MOTION**

Pursuant to Local Rules 7-11 and 79-5, as well as Judge Orrick's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz respectfully request an order sealing the physical copies in the Court's files of Exhibits A through V to the Supplemental Declaration of Cimone Nunley in Support of Plaintiffs' Motion for Sanctions. This Motion is based on the Supplemental Declaration of Cimone Nunley in support thereof, and the documents to be sealed are laid out below:

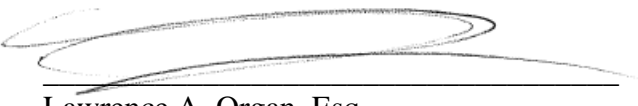
| <b>Document</b>  | <b>Designating Party</b> | <b>Basis for Sealing</b>  |
|--|--------------------------|---|
| Exhibit A: Deposition of Plaintiff Demetric Di-az      | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit B: TESLA-0000060                               | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit C: TESLA-0000004 to TESLA-0000008              | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit D: TESLA-0000047 to TESLA-0000048              | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit E: TESLA-0000068 to TESLA-0000069              | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit F: TESLA-0000125 to TESLA-0000126              | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit G: TESLA-0000308                               | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit H: Deposition of Plaintiff Owen Diaz, Vol. I   | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit I: Deposition of Plaintiff Owen Diaz, Vol. III | nextSource, Inc.         | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit J: TESLA-0000314 to TESLA-0000316              | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit K: TESLA-0000816 to TESLA0000818               | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit L: TESLA-0000317                               | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit M: TESLA-0000185 to TESLA0000186               | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit N: TESLA-0000540 to TESLA0000544               | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit O: TESLA-0000486                               | Tesla, Inc.              | Marked confidential pursuant to Protective Order (Dkt. No. 50). |

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|--|-------------|---|
| Exhibit P: TESLA-0000488                         | Tesla, Inc. | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit Q: TESLA-0000495 to TESLA0000497         | Tesla, Inc. | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit R: TESLA0000514                          | Tesla, Inc. | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit S: TESLA-0000521 to TESLA0000523         | Tesla, Inc. | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit T: TESLA-0000533 to TESLA0000534         | Tesla, Inc. | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit U: TESLA-0000594 to TESLA0000597         | Tesla, Inc. | Marked confidential pursuant to Protective Order (Dkt. No. 50). |
| Exhibit V: E-mail thread dated November 25, 2019 | Tesla, Inc. | Marked confidential pursuant to Protective Order (Dkt. No. 50). |

Publicizing these documents would violate the Protective Order entered in this case [Dkt. No. 50].

DATED: January 13, 2020

By:

  
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 Attorneys for Plaintiffs  
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